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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

MAXIMILIAN KLEIN, et al., on behalf of
themselves and all others similarly situated,

Plaintiffs,

v.

META PLATFORMS, INC., a Delaware
Corporation,

Defendant.

Case No. 3:20-cv-08570-JD

**DECLARATION OF DAVID Z. GRINGER
IN SUPPORT OF DEFENDANT META
PLATFORMS, INC.'S OPPOSITIONS TO
PLAINTIFFS' MOTIONS *IN LIMINE***

Judge: Hon. James Donato

1 I, DAVID Z. GRINGER, declare as follows:

2 1. I am a partner at the law firm Wilmer Cutler Pickering Hale and Dorr LLP. I
3 represent Defendant Meta Platforms, Inc. in the above-captioned action. I submit this
4 declaration in support of Meta's Oppositions to Plaintiffs' Motions *In Limine*.

5 2. Attached hereto as Exhibit 1 is a true and correct copy of excerpts of the transcript
6 from Rachel Banks Kupcho's deposition held on May 22, 2023.

7
8 I declare that the foregoing is true and correct under penalty of perjury.

9 Executed on this 7th day of September, 2025, in Brooklyn, New York.

10 By: /s/ David Z. Gringer
11 David Z. Gringer
12
13
14

15 **SIGNATURE ATTESTATION**

16 This document is being filed through the Electronic Case Filing (ECF) system by attorney
17 Kevin Y. Teruya. By his signature, Mr. Teruya attests that he has obtained concurrence in the filing
18 of this document from each of the attorneys identified on the caption page and in the above
19 signature block.
20

21 By: /s/ Kevin Y. Teruya
22 Kevin Y. Teruya
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